

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION

FILED
RICHARD W. NAGEL
CLERK OF COURT

2022 JUN 30 PM 12:53

U.S. DISTRICT COURT
SOUTHERN DIST. OHIO
EAST DIV. COLUMBUS

UNITED STATES OF AMERICA,

Plaintiff,

vs.

YOUSIF AMIN MUBARAK,

Defendant.

CASE NO. 2:21-cr-227

JUDGE SARGUS

SUPERSEDING INDICTMENT

18 U.S.C. § 875(c)

THE GRAND JURY CHARGES:

INTRODUCTION

1. Beginning on or about September 12, 2021, and continuing through on or about September 21, 2021, the defendant, **YOUSIF AMIN MUBARAK**, placed numerous threatening and harassing telephone calls to businesses, schools, and government officials in the Canal Winchester, Pickerington, and Columbus, Ohio areas.

COUNT 1

(Transmission of a Threat in Interstate Commerce)

2. Paragraph 1 of the Introduction section is incorporated herein.

3. On or about September 12, 2021, at no later than approximately 5:43 p.m., in the Southern District of Ohio and elsewhere, the defendant, **YOUSIF AMIN MUBARAK**, knowingly and willfully did transmit in interstate commerce from outside the State of Ohio, to Canal Winchester, Ohio, a telephonic communication to an employee at Brew Dog, and the

communication contained a threat to injure, to wit, that there was a bomb inside the building and they needed to get all of the women and children out of the building.

In violation of Section 875(c) of Title 18 of the United States Code.

COUNT 2
(Transmission of a Threat in Interstate Commerce)

4. Paragraph 1 of the Introduction section is incorporated herein.

5. On or about September 12, 2021, at no later than approximately 6:33 p.m., in the Southern District of Ohio and elsewhere, the defendant, **YOUSIF AMIN MUBARAK**, knowingly and willfully did transmit in interstate commerce from outside the State of Ohio, to Canal Winchester, Ohio, a telephonic communication to an employee at Home Depot, and the communication contained a threat to injure, to wit, that there was a bomb inside the building, it will blow at the top of the hour and they needed to get all of the women and children out of the building.

In violation of Section 875(c) of Title 18 of the United States Code.

COUNT 3
(Transmission of a Threat in Interstate Commerce)

6. Paragraph 1 of the Introduction section is incorporated herein.

7. On or about September 12, 2021, beginning at approximately 6:52 p.m. and continuing until approximately 6:56 p.m., the defendant, **YOUSIF AMIN MUBARAK**, placed at least six calls to the Best Western in Canal Winchester, Ohio.

8. During at least one of those calls on or about September 12, 2021 at approximately 6:56 p.m., in the Southern District of Ohio and elsewhere, the defendant, **YOUSIF AMIN MUBARAK**, knowingly and willfully did transmit in interstate commerce from outside the State of Ohio, to Canal Winchester, Ohio, a telephonic communication to an employee at the Best

Western, and the communication contained a threat to injure, to wit, in part, that “There’s a fucking, that two guys with suicide bombs that are staying at your fucking place and it’s going to fucking blow the fuck up alright when I tell them to...I want you to get all the kids and women out all right.”

In violation of Section 875(c) of Title 18 of the United States Code.

COUNT 4

(Transmission of a Threat in Interstate Commerce)

9. Paragraph 1 of the Introduction section is incorporated herein.

10. On or about September 12, 2021, at approximately 10:00 p.m., members of the Fairfield County Sheriff’s Office, Columbus Police Department and the Federal Bureau of Investigation visited the last known residence of the defendant, **YOUSIF AMIN MUBARAK**, in Canal Winchester, Ohio and were observed by **YOUSIF AMIN MUBARAK** through his Ring doorbell camera. **YOUSIF AMIN MUBARAK** taunted officers through his Ring doorbell throughout the interaction.

11. On or about September 12, 2021, at approximately 10:20 p.m., in the Southern District of Ohio and elsewhere, the defendant, **YOUSIF AMIN MUBARAK**, knowingly and willfully did transmit in interstate commerce from outside the State of Ohio, to Lancaster, Ohio, a telephonic communication to C.S., a Fairfield County Sheriff’s Office dispatcher, and the

communication contained a threat to injure C.S., to wit, in part, that “you can die, fucking whore” and “she would get two bullets in the head.”

In violation of Section 875(c) of Title 18 of the United States Code.

COUNT 5

(Transmission of a Threat in Interstate Commerce)

12. Paragraph 1 of the Introduction section is incorporated herein.

13. On or about September 13, 2021, at approximately 7:06 a.m., in the Southern District of Ohio and elsewhere, the defendant, **YOUSIF AMIN MUBARAK**, knowingly and willfully did transmit in interstate commerce from outside the State of Ohio, to Canal Winchester, Ohio, a telephonic communication to an employee at Canal Winchester Middle School, and the communication contained a threat to injure, to wit, in part, that “I have placed several bombs in your building” and “I would get your women and children out now.”

In violation of Section 875(c) of Title 18 of the United States Code.

COUNT 6

(Transmission of a Threat in Interstate Commerce)

14. Paragraph 1 of the Introduction section is incorporated herein.

15. On or about September 13, 2021, at approximately 7:30 a.m., in the Southern District of Ohio and elsewhere, the defendant, **YOUSIF AMIN MUBARAK**, knowingly and willfully did transmit in interstate commerce from outside the State of Ohio, to Pickerington, Ohio,

a telephonic communication to an employee at Pickerington North High School, and the communication contained a threat to injure, to wit, that there are two suicide bombers in the school.

In violation of Section 875(c) of Title 18 of the United States Code.

COUNT 7
(Transmission of a Threat in Interstate Commerce)

16. Paragraph 1 of the Introduction section is incorporated herein.

17. From at least September 1, 2021, and continuing until on or about September 21, 2021, the defendant, **YOUSIF AMIN MUBARAK**, placed approximately 87 telephone calls to A. P., a Franklin County Municipal Court Judge, who previously presided over a case involving **YOUSIF AMIN MUBARAK**.

18. On or about September 16, 2021, at approximately 4:12 p.m., the defendant, **YOUSIF AMIN MUBARAK**, placed a telephone call to A.P., in which he stated, in part, “I will find you. I already have a fucking private investigator on your fucking ass, dumb ass whore. So, keep watching for fucking cars that are fucking following you, dumb ass whore.”

19. On or about September 16, 2021, at approximately 5:08 p.m., the defendant, **YOUSIF AMIN MUBARAK**, placed a telephone call to A.P., in which he stated, in part, “Listen. Listen to me clearly whore. Alright, I will find fucking find you. You think the Highway Patrol, the Sherriffs are going to do something, the fucking FBI, I will, I do not give a fuck, I will find you, even if that means I die” and “I will find you... And the secretary listening to this voicemail and the FBI whatever who the fuck is listening, the Sheriff’s Office, Columbus CPD, I do not give a fuck, I’m not even in fucking in Ohio right now...”

20. On or about September 16, 2021, at approximately 6:42 p.m., in the Southern District of Ohio and elsewhere, the defendant, **YOUSIF AMIN MUBARAK**, knowingly and willfully did transmit in interstate commerce from outside the State of Ohio, to Columbus, Ohio,

telephonic communications to A.P., and the communications contained a threat to injure A.P., to wit, in part, that “I will fucking find you,” “I will fucking find every fucking daughter, every fucking fucking egg that you fucking had in this fucking world with the fucking sperm, I will fucking find it bitch, I will fucking find it and I will fucking kill you. I will fucking kill you myself, bitch.”

In violation of Section 875(c) of Title 18 of the United States Code.

A TRUE BILL

S/ FOREPERSON

FOREPERSON

**KENNETH L. PARKER
UNITED STATES ATTORNEY**

Jessica W. Knight

**JESSICA W. KNIGHT, (0086615)
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